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Subject: BREAKING – TAKE ACTION: RCC responds to FERC's Final Environmental Impact Statement on the

ACP

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BREAKING -TAKE ACTION

July 22, 2017

RCC responds to FERC's Final Environmental Impact Statement on the ACP

Yesterday, the Federal
Energy Regulatory
Commission released its



Photo Credit: Delaware Riverkeeper Network

long-awaited Final Environmental Impact Statement (EIS) about the proposed 600 mile, \$5.5 billion Atlantic Coast Pipeline (ACP). The draft EIS dismissed the short and long-term environmental, public health, and community safety impacts, and the final version denies the severity of the pipeline's effects as well.

As the United States shifts away from coal, natural gas has been touted as a safe and necessary bridge fuel to clean energy. Utilities, including Dominion and Duke Energy, chase high returns on building new pipeline infrastructure--what Rachel Carson called the "quick and easy profit." In the process, they sacrifice communities, workers, and the environment. In its new report, coming in September 2017, the Rachel Carson Council debunks the many myths surrounding natural gas infrastructure--from fracking the Marcellus and Utica Shales to the proposed ACP.

The Rachel Carson Council immediately identified a few of many inadequacies with the FERC EIS:

1. FERC underestimates the size of environmental justice populations that will be affected by new compressor stations.

One of many environmental justice concerns of the ACP is the compressor station that will be located in Union Hill Virginia, a mostly African-American community that was founded by slaves freed after the Civil War. Natural gas compressor stations run 24/7 and are sources of toxic emissions such as methane, nitrogen oxides, particulate matter and

volatile organic compounds. Communities living near compressor stations have experienced a range of symptoms ranging from skin rashes to gastrointestinal, respiratory, neurological and psychological problems (PSR). Their construction also generates dust and noise which can exacerbate asthma and increase stress.

The FERC EIS states: "None of the three census tracts within 1 mile of the proposed Compressor Station 2 are designated minority environmental justice populations based on the methodology described above." What's their methodology? They take the average minority population of entire census tracts, which are miles wide and thus fail to accurately represent the demographic that lives directly next to the compressor station. For the census tract nearest the compressor station there is a 31.8% minority representation in the population. Yet a careful survey of the houses on the three roads adjacent to the compressor station was conducted by community advocates and revealed that the population directly impacted by the compressor station has an 81.6% minority representation (Fjord).

Dismissing the site-specific data it was provided, FERC's use of broad geographic census data allows it to conclude, "environmental justice populations would not be disproportionately affected by the projects."

For more on Union Hill: http://www.huffingtonpost.com/entry/echoes-of-a-dark-past-at-virginias-standing-rock us 596d21c0e4b010d77673185a

2. FERC is not designed to properly evaluate the need for

pipelines.

FERC has been criticised by many, including former Commissioner Norman Bay, for evaluating the need for pipelines purely on the existence of purchase contracts for the product. In the case of the ACP, the purchasers of gas are subsidiaries of the same companies building the pipeline, and are incentivized to build their own pipelines instead of utilizing the entirely sufficient existing network. Despite these warnings, FERC determined a need for the ACP. Despite several studies showing there is sufficient pipeline capacity already (Synapse, IEEFA, Hadwin), FERC concludes, "other existing natural gas transmission systems in the ACP and SHP area lack the available capacity to meet the purpose of the projects."

They go on to write, "We also conclude alternative energy sources, energy conservation, and efficiency are not within the scope of this analysis because the purpose of ACP and SHP is to transport natural gas."

3. Alternative energy sources, energy conservation, and efficiency should be within the scope of FERC's analysis.

Dominion claims that the ACP would provide enough natural gas to power homes for "generations." However, we do not need to lock ourselves into "generations" of dirty energy, when renewables can feasibly provide 80% of U.S. electricity by 2050 (<u>Dept of Energy study</u>). The cost of renewable energy has fallen dramatically in the last 5 years, and even big oil

companies have started to invest in clean energy.

As Food & Water Watch asserts, "we already have the technologies to make a Clean Energy Revolution a reality" (Food & Water Watch). What we need are policies that are going to support these technologies and move us away from natural gas and other dirty energy sources. They call for reforming renewable portfolio standards, improving net metering programs, increasing energy efficiency, expanding community choice, supporting community solar, and using sustainable transportation.



- 1. Virginia and North Carolina residents: decisionmakers should know that we don't need the Atlantic Coast Pipeline, but rather investment in clean and affordable energy.
- NC Gov. Roy Cooper: (919)
 814-2000 or contactgov@nc.gov
 - VA Lt. Gov. Ralph Northam
- Democratic nominee (804) 786-2078 or @RalphNortham
- 2. <u>Call your Senator</u> to tell them not to confirm two of the new FERC nominees, Neil Chatterjee and Robert Powelson. Both have a history of protecting fossil fuel interests and fighting action on climate change mitigation.



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